

IV. STATEMENT OF CLAIM

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WHILE ACTING UNDER THE COLOR OF STATE LAW ALL THE DEFENDANTS IN THIS COMPLAINT, VIOLATED MY EIGHTH AMENDMENT RIGHT TO THE CONSTITUTION OF THE UNITED STATES.

THE DEFENDANTS WERE DELIBERATELY INDIFFERENT TO A SERIOUS MEDICAL NEED.

THE FACTS OF THIS CASE ARE AS FOLLOWED. DURING THE EVENING OF OCT. 17, 2020 THE NURSE JESSICA MOORE CAME INTO HOUSING UNIT #3, B wing TO PASS OUT WATCH-TAKE MEDICATION. I CAME DOWN THE STAIRS TO TAKE A PILL AND I DID AND AFTERWARDS I WALKED ABOUT 8 FEET AWAY FROM THE TABLE THE NURSE WAS USING TO PASS OUT THE MEDS. SUDDENLY, I JUST FAINTED AND FELL TO THE FLOOR RIGHT IN SIGHT OF THE NURSE. I COULD HEAR THE NURSE YELLING "GET HIM OFF THE FLOOR." A Sgt. AND AN INMATE LIFTED ME FROM OFF THE FLOOR IN A STANDING POSITION BUT I WAS UNABLE TO STAND UP ON MY TWO FEET. I WAS SAT DOWN ON A STOOL AND IMMEDIATELY SWEAT STARTED TO POUR DOWN FROM MY HEAD. I REMEMBER HEARING NURSE JESSICA MOORE YELLING AGAIN "GET HIM A TOWEL". ONCE SHE STARTED TAKING MY VITAL SIGNS AND PUT ^{THE} PULSE OXIMETER ON MY FINGER, MY OXYGEN LEVEL WAS SO LOW JESSICA SAID "WE GOT TO GET HIM OUT OF HERE", AND CALLED IN A CODE 16 (A MEDICAL-EMERGENCY).

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I WAS IMMEDIATELY TAKEN TO THE MAIN MEDICAL BUILDING HERE AND PLACED UNDER OXYGEN. THERE WERE SOME TEST DONE AND CONSEQUENTLY I WAS RUSHED OUT OF THE INSTITUTION BY AMBULANCE (STILL ON OXYGEN) TO MOSAIC LIFE CARE IN ST. JOSEPH, MO. IT'S ABOUT 30 MINUTES AWAY FROM THIS PRISON IN CAMERON, MO.

ONCE I ARRIVED TO THE ER. ~~AT~~ MOSAIC LIFE CARE I WAS ³DIAGNOSED WITH A (MYOCARDIAL INFARCTION) WHICH WAS EXPLAINED TO ME TO BE SOME TYPE OF HEART EVENT WHICH CAUSED ME TO FAINT EARLIER THAT EVENING. I WAS ALSO POSITIVE FOR COVID-19. I WAS ADMITTED (STILL ON OXYGEN) AND TAKEN UP TO THE 5TH FLOOR TO A ROOM. WHILE I WAS THERE TREATED WITH STEROIDS AND DIFFERENT MEDICATIONS ALSO HAD TEST DONE ON MY HEART AND IT WAS NEGATIVE FOR ANY MAJOR DAMAGE TO MY HEART. THE MEDICAL STAFF AT MOSAIC DISCUSSED THE PLAN OF TREATMENT FOR 3 DAYS AND ON OCT. 20, 2020 I WAS DISCHARGED BACK TO THIS FACILITY. I WAS ON OXYGEN FOR THE ENTIRE TIME (3 DAYS) I WAS THERE AT MOSAIC LIFE CARE. PRIOR TO BEING DISCHARGED FROM MOSAIC, MEDICAL STAFF THERE INFORMED ME THAT I WOULD NEED TO CONTINUE MY PLAN OF TREATMENT ONCE I WAS DISCHARGED BACK TO THIS FACILITY.

I'M NOT ALLOWED A COPY OF THE ORDER NOR AM I ALLOWED TO SEE THE ORDER. IT'S GIVEN TO THE TRANSPORTATION OFFICER WHO TRANSFERS ME BACK TO THIS FACILITY AND THE ORDER IS GIVEN TO MEDICAL STAFF HERE AT WMSG. ^{DIAGNOSED} NOTE I WAS ALSO ^{RESPIRATORY FAILURE.}

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ON OCT 20, 2020 WHEN I CAME BACK TO THIS FACILITY I WAS MET WITH NURSE JENNIFER CANNON WHO WAS AT THE TIME DIRECTOR OF NURSES (D.O.N.) SHE DID THE ASSESSMENT AND TOOK MY VITALS. WHEN SHE PUT THE PULSE OXIMETER ON MY FINGER TO CHECK MY OXYGEN LEVEL OBVIOUSLY IT WAS LOW BECAUSE SHE SAID "TAKE A COUPLE OF DEEP BREATHES," SO I DID THEN SHE SAID "TAKE A COUPLE MORE," SO I DID THEN SHE SAID "SEE THERE, THAT'S ALL YOU HAVE TO DO." "THEY ALWAYS TRYING TO GET YOU GUYS HOOKED ON THAT OXYGEN." AT THAT MOMENT I WAS NOT ON OXYGEN BUT I THOUGHT I WOULD BE SENT TO THE INFIRMARY (T.C.U.) TO CONTINUE MY OXYGEN THERAPY. I WAS NOT, INSTEAD, JENNIFER CANNON (D.O.N.) SENT ME ^{TO} HOUSING UNIT #10 WHICH IS JUST A REGULAR HOUSING UNIT WITH 4 WINGS (A B C D) DESIGNED FOR GENERAL POPULATION. TWO WINGS A+B WERE EMPTIED OUT TO BE USED AS A PLACE TO QUARANTINE AND ISOLATE ANY INMATES THAT TESTED POSITIVE FOR COVID-19 OR SHOWED ANY SIGNS OR SYMPTOMS OF BEING ASYMPTOMATIC. ALSO, IT'S USED FOR INMATES THAT LEAVES THIS FACILITY ON OUTCOUNT TO COURT, MEDICAL ISSUES, ETC AND DON'T RETURN BACK TO THIS FACILITY THE SAME DAY. WHAT HOUSING UNIT #10 IS NOT ^{EQUIPPED} ~~EQUIPPED~~ FOR IS INMATES THAT NEED OXYGEN THERAPY AS WELL AS OTHER FORMS OF MEDICAL TREATMENT. IT DOES NOT HAVE A SPECIAL ELECTRICAL OUTLET IN THE CELL FOR AN OXYGEN TANK TO BE PLUGGED INTO IN CASE OF A POWER OUTAGE. THERE IS NO MEDICAL EMERGENCY CALL BUTTON IN THOSE CELL.

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ON OCT. 22, 2020 JUST 2 DAYS LATER WHEN THE NURSE CHECKED MY VITALS, AT MY REQUEST, THE PULSE OXIMETER READ MY OXYGEN LEVEL AT 69%. THE NURSE SAID "WE HAVE TO GET HIM OUT OF HERE." SHE CALLED A CODE 16 (MEDICAL EMERGENCY). FOR THE (2ND TIME) I WAS RUSHED OUT OF THIS FACILITY BY AMBULANCE BACK TO MOSAIC LIFE CARE. I WAS PLACED UNDER OXYGEN IMMEDIATELY WHILE I WAS IN THE AMBULANCE.

WHEN I ARRIVED AT THE E.R. I WAS IMMEDIATELY PLACED ON OXYGEN AND DIAGNOSED WITH ACUTE RESPIRATORY FAILURE. I WAS CONSEQUENTLY ADMITTED AND TAKEN BACK TO THE 5TH FLOOR. WHEN THE NURSES SAW ME ONE OF THEM SAID "WHAT HAPPENED TO YOU?" BEFORE I COULD EVEN RESPOND ONE OF THE NURSES REPLIED "THEY DIDN'T GIVE YOU NO OXYGEN, DID THEY?" I ANSWERED, "NO THEY DIDN'T." ALL THE NURSES JUST SHOOK THEIR HEADS FROM SIDE TO SIDE IN TOTAL DISBELIEF. I WAS ASSIGNED TO ROOM #5113. I WAS THERE AT MOSAIC FOR 14 DAYS. THE MEDICAL RECORDS CLEARLY STATES THAT PRIOR TO DISCHARGING ME BACK TO THIS FACILITY, THEY (MOSAIC MEDICAL STAFF) CONTACTED THE MEDICAL STAFF HERE AT WMCC AND INFORMED STAFF "HE WAS TREATED AGGRESSIVELY AND SLOWLY IMPROVED." "HE WAS PLACED ON ORAL ANTICOAG AND WAS GRADUALLY WEANED TO A LOWER LEVEL OF OXYGEN." "UNFORTUNATELY HE WAS NOT ABLE TO BE COMPLETELY WEANED FROM THE OXYGEN AT THE TIME OF DISCHARGE." "HIS FACILITY STATED THEY COULD PROVIDE THE LEVEL OF OXYGEN HE WOULD NEED AND HE WAS

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MOsaic's MEDICAL RECORD STATES THAT I WAS DISCHARGED BACK TO THIS FACILITY ON NOV. 5, 2020 BUT THIS FACILITY GAVE ME DOCUMENTED PAPERWORK SAYING THAT I WAS OUT OF THE INSTITUTION ON A MEDICAL OUTCOUNT ON NOV. 5, 2020. IT WAS VERY CONFUSING TO SAY THE LEAST. ONCE I RETURN HERE I THOUGHT THAT I WOULD BE ASSIGNED TO THE INFIRMARY WHERE I COULD CONTINUE THE PLAN OF TREATMENT THAT WAS ORDERED BY THE MEDICAL STAFF AT MOSAIC LIFE CARE. THIS WAS AT THE HEIGHT OF THE COVID-19 PANDEMIC AND INMATES HAD ALREADY STARTED DYING HERE AT W.M.C.C.

THERE WAS NO ROOM FOR ME IN THE INFIRMARY. THERE ARE ONLY ABOUT 11 ROOMS IN THE INFIRMARY FOR A PRISON POPULATION OF 2000 PRISONERS AT THAT TIME,

I WAS PUT RIGHT BACK IN THE SAME DIRE SITUATION: BACK IN HOUSING UNIT #10 - NO OXYGEN, NO MEDICATION NO BLOOD THINNERS. I ASKED AND ASKED FOR OXYGEN AND MEDICATION, I DIDN'T RECEIVE ANYTHING JUST ISOLATION.

ON THE EARLY MORNING HOUR OF NOV. 11, 2020 ABOUT 12:30AM I WENT TO USE THE TOILET, I WAS SITTING DOWN AND ALL OF A SUDDEN IT FELT LIKE A ELECTRICAL CURRENT TRAVELED THROUGH THE LEFT SIDE OF MY BODY. I DIDN'T ~~KNOW~~ WHAT IT WAS BUT I REALIZED THAT I WAS PARALYZED ON THE LEFT-SIDE OF MY BODY. I TRIED TO OPEN MY MOUTH AND HOLLER FOR SOME HELP BUT I WAS UNABLE TO MAKE A SOUND. I SAT THERE UNABLE TO DO ANYTHING AND HAD FEELINGS THAT I MIGHT DIE RIGHT HERE ON THIS TOILET.

IT WAS A LIVING NIGHTMARE.

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(D.)

AS I SAT THERE ON THE TOILET I BEGIN TO FEEL HOPELESS BECAUSE THE NEXT MANDATORY ^{TIME} SOMEONE HAD TO WALK BY THIS CELL WOULD BE AT 2:00AM COUNT TIME.

ALL OF A SUDDEN ^{THE} LIGHT FLICKED ON FROM THE OUTSIDE SWITCH AND A COI JUST HAPPEN TO BE MAKING A WALK THROUGH, WHEN THE LIGHT CAME ON I WAS ABLE TO RAISE MY RIGHT HAND UP AND WAVE IT AROUND VIGOROUSLY TO GET THE OFFICERS' ATTENTION. THE OFFICER COULD TELL SOMETHING WAS WRONG AND ASKED "ARE YOU SICK?" I WAS ABLE TO VIGOROUSLY SHAKE MY HEAD UP AND DOWN WITH MY MOUTH WIDE OPEN TRYING TO JUST MAKE A SOUND BUT NOTHING WOULD COME OUT.

THE OFFICER SAID "OKAY" AND CALLED IN FOR BACK-UP, MOMENTS LATER THE CELL DOOR OPENED AND 2 OFFICERS CAME IN TO THE CELL AND LIFT ME UP OFF THE TOILET, ONE HAD TO PULL MY CLOTHES UP ON MY BUTT, THEN LIFT ME UP AND SIT ME INTO A WHEEL CHAIR THAT THEY HAD SAT OUTSIDE THE CELL DOORWAY. THEN SOMEONE SAID "YOU HAD A STROKE" JOYCE CHAMBERLAIN CALLED IN A CODE 16.

FOR THE (3RD) TIME IN (25 DAYS) I'M RUSHED OUT THE INSTITUTION IN AN AMBULANCE, THIS TIME, TO CAMERON REGIONAL MEDICAL CENTER FIRST, SINCE IT WAS 10 MINUTES AWAY, THERE THEY DID LAB TEST SCANS AND COVID-19 TEST THAT CAME BACK NEGATIVE. I WAS DIANOSSED WITH Hypoxic Respiratory Failure AND STROKE. I WAS ALSO ON OXYGEN ONCE I LEFT ~~THE~~ ^{WMCC} STAFF AT WMCC WILL TELL YOU THERE WAS NO OXYGEN TANK IN THAT CELL. PLUS THE CAMERAS WILL PROVE I'M TELL^{ING} THE TRUTH.

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I WAS TRANSFERRED TO SAINT LUKE'S HOSPITAL IN KANSAS CITY, MO. THERE THEY TOOK SCANS OF MY BRAIN, HEART LUNGS ETC. ALSO LAB TEST AND A COVID-19 TEST ON 11-11-20 THAT ALSO CAME BACK NEGATIVE FOR COVID-19.

I STAYED IN SAINT LUKE'S HEALTH SYSTEM FOR 6 DAYS.

MEDICAL RECORDS WILL SHOW PRIOR TO MY DISCHARGE ON PAGE 52 UNDER SPECIAL INSTRUCTIONS: SAINT LUKE'S CONFIRMED WITH GLORIA HERE AT W.M.CC. INFIRMARY, THAT I WOULD BE ACCEPTED INTO THE INFIRMARY TODAY ON NOV. 17, 2020

I WAS DISCHARGED AND RETURN HERE STRAIGHT TO THE INFIRMARY FOR THE FIRST TIME ON NOV. 17, 2020. AT THIS POINT MEDICAL STAFF HERE AT WMCC FOLLOWED THE DISCHARGE ORDERS AND PLAN OF TREATMENT WAS FOLLOWED COMPLETELY UNTIL I WAS DISCHARGED FROM THE INFIRMARY 30 DAYS LATER ON DEC. 18, 2020.

IT'S THIS TRUTH FROM NOV. 17, 2020 TO DEC. 18, 2020 WHILE I WAS IN THE INFIRMARY THAT MEDICAL STAFF HERE ARE TRYING TO BLEND IN WITH THE VIOLATIONS THAT OCCURRED ON:
OCT. 20, 2020 TO OCT. 22, 2020 AND NOV. 5, 2020 TO NOV. 11, 2020.

THOSE ARE THE DATES WHEN THE DAMAGE WAS DONE AND THE INJURIES OCCURED.

THE CAMERAS WILL ALSO SHOW THAT I'M TELLING THE TRUTH.

II. BASIS FOR JURISDICTION

D. THE DEFENDANT CORIZON HEALTH SERVICE AT THE TIME THE VIOLATION OCCURRED FROM: OCT. 20, 2020 TO OCT. 22, 2020 AND FROM: NOV. 5, 2020 TO NOV. 11, 2020.

ALSO, DURING THE TIME PERIOD FROM: AUG. 2021 TO NOV. 2021 WHEN I PAID CORIZON HEALTH SERVICE \$68.00 ^{FOR} A COPY OF MY PERSONAL MEDICAL RECORDS. CORIZON WAS THE HEALTH PROVIDER FOR MISSOURI DEPARTMENT OF CORRECTIONS (MO.D.O.C.). CORIZON WAS ALSO WORKING UNDER THE COLOR OF STATE LAW.

I, RODNEY B. HOLMES AM THE PLAINTIFF IN THIS COMPLAINT.

THIS FACILITY W.M.C.C. HAS I-WING OF A HOUSING UNIT THAT IS NAMED E.C.U. MEANING ENHANCE CARE UNIT AND IT'S DESIGNED FOR PRISONERS THAT ARE CLASSIFIED AS PATIENTS. PATIENTS ARE THE PEOPLE THAT FOR VARIOUS MEDICAL REASONS NEEDS ENHANCED CARE. SOME MAY HAVE BEEN DIAGNOSED WITH DEMENTIA, ALZHEIMER'S DISEASE OR PARKINSON'S DISEASE. SOME PATIENTS MAY BE PARAPLEGIA AND SOME OF WHAT MAY BE CLASSIFIED AS OLD AGE. I DON'T KNOW THE AGE CRITERIA BUT, ~~ARE~~ ^{ARE} PATIENTS IN THERE 90'S WITH VARIOUS HEALTH ISSUES. THERE ARE PRISONERS NAMED D.L.A.'S MEANING DAILY LIVING ASSISTANTS THAT ARE HIRED AND PAID \$40.00 PER MONTH TO HELP AND ASSIST THE PATIENTS. THERE IS NO NURSE IN THIS WING OR UNIT. ALL THE PATIENTS ARE ASSIGNED TO THE BOTTOM FLOOR. THE TOP WALK IS FOR THE D.L.A.'S AND ALL THE EXTRA CELLS ARE UTILIZED WITH PRISONERS IN GENERAL POPULATION. IN MARCH OF 2020 I WAS IN THIS ECU WING NOT AS A PATIENT BUT AS GENERAL POPULATION.

II. BASIS FOR JURISDICTION

D. THE DEFENDANT CORIZON HEALTH SERVICE: CONTINUES:

IN MARCH 2020 THE COVID-19 VIRUS HIT MO. DOC AND THERE WERE CASES HERE AT VMCC. THE ECU WING WAS EMPTIED OUT AND ONLY THE PATIENTS AND THE DLA'S WERE ALLOWED TO STAY AND THE UNIT WENT ON ISOLATION STATUS. EVERYONE ELSE ^{WERE} PUT OUT THE WING AND ASSIGNED TO OTHER WINGS AND HOUSING UNITS IN GENERAL POPULATION. THE ECU WING HELD 52 PRISONERS WHEN IT WAS FULL, NOW THE WING HAS ONLY 19 PEOPLE IN IT, THE PATIENTS AND DLA'S

I WAS NOT CLASSIFIED AS A PATIENT SO I WAS ASSIGNED TO GENERAL POPULATION. AT THE TIME I WAS BEING TREATED FOR PROSTATE CANCER AND INFORMED BY THE ONCOLOGIST THAT MY IMMUNE SYSTEM WAS GREATLY COMPROMISED AND THIS FACT MADE ME VERY SUSCEPTIBLE TO THE COVID-19 VIRUS. MEDICAL RECORDS WILL SHOW THAT I HAD BEEN TREATED WITH 8 WEEKS OF RADIATION AND AT THAT TIME STILL DOING 2 YRS OF HORMONE THERAPY TREATMENT. I WANTED TO STAY AND BE ISOLATED AND BETTER MY CHANCES OF NOT BEING EXPOSED TO THE COVID-19 VIRUS. I WAS NOT ALLOWED TO STAY IN ISOLATION AND TOLD THAT I ^{WAS} NOT A PATIENT AND I ^{DID} NOT MEET THE CRITERIA TO BE A PATIENT. CORIZON HEALTH SERVICE DID NOT HAVE A POLICY IN PLACE THAT WOULD HAVE ALLOWED ME TO STAY IN ISOLATION AND BE BETTER PROTECTED AGAINST A VIRUS THAT BECAME DANGEROUS AND DEADLY.

II. BASIS FOR JURISDICTION

D. THE DEFENDANT CORIZON HEALTH SERVICE: CONTINUES:

AS A RESULT OF NOT BEING ABLE TO BE IN ISOLATION DURING THE COVID-19 PANDEMIC, I WAS EXPOSED TO THE VIRUS AND ON OCT. 17, 2020 RUSHED OUT THE FACILITY BY AMBULANCE DUE TO COMPLICATIONS FROM THE COVID-19 VIRUS. MEDICAL RECORDS WILL VERIFY THAT I WAS ADMITTED AT MOSAIC LIFE CARE AND DIAGNOSED WITH RESPIRATORY FAILURE WITH HYPOXIA, SYNCOPE AND POSITIVE FOR SARS-CoV-2 PCR. I WAS ON OXYGEN FOR THE WHOLE TIME I WAS ADMITTED AT MOSAIC LIFE CARE THE 1ST TIME AND THE 2ND TIME. THE 1ST TIME I WAS ADMITTED FOR 3 DAYS AND DISCHARGED ON OCT. 20, 2020. THE MEDICAL STAFF AT MOSAIC CONSULTED WITH ^{ME} EVERYDAY AND TOLD ME THAT WHEN I RETURNED TO THIS FACILITY WMCC, I WOULD CONTINUE MY OXYGEN THERAPY. CORIZON HEALTH SERVICE'S POLICY OF NOT ALLOWING ME AS A PATIENT, TO HAVE A COPY OF THE MEDICAL ORDER AND ONLY ALLOWING THE MEDICAL STAFF HERE AT W.M.CC. IS UNFAIR AND UNJUST AND IN THIS CASE IT ALLOWED NURSE JENIFFER CANNON TO COVER-UP THE TRUTH AND TO HAVE THE MEDICAL RECORDS FROM MOSAIC LIFE CARE ENC: 164101057 TO BE ALTERED AND FALSIFIED TO PROTECT THE COVER-UP. WHEN I WAS DISCHARGED FROM MOSAIC BACK TO THIS FACILITY WMCC NURSE JENNIFER CANNON DID THE ASSESSMENT AND TOOK MY VITALS. WHEN SHE CHECKED MY OXYGEN LEVEL WITH THE PULSE OXIMETER ON MY FINGER, SHE SAID "TAKE A COUPLE OF DEEP BREATHERS," SO I DID, THEN SHE SAID "TAKE A COUPLE MORE," I DID, SO THEN SHE SAID "SEE THERE, THAT'S ALL YOU GOT TO DO" "THEY ALWAYS TRYING TO GET YOU GUYS HOOKED ON THAT OXYGEN."

II. BASIS FOR JURISDICTION

D. THE DEFENDANT CORIZON HEALTH: CONTINUES

THE NURSE JENNIFER CANNON SUBSEQUENTLY ASSIGNED ME TO HOUSING UNIT #10. H.U.#10 IS A REGULAR H.U. FOR GENERAL POPULATION, IT HAS 4 WINGS (A,B,C,D) EACH WING HOLDS ABOUT 50 PRISONERS. A AND B WING WERE CLEARED OUT AND WERE USED TO QUARANTINE INMATES THAT TEST POSITIVE FOR COVID-19 OR SHOWED ANY SIGNS OF BEING ASYMPTOMATIC. THE WINGS WERE ALSO USED FOR OUTCOUNT RETURNS. THOSE ARE THE INMATES THAT HAD TO LEAVE THE PRISON FOR COURT, MEDICAL REASONS, ETC. WHATEVER THE REASON WAS FOR BEING THERE, YOU WOULD BE THERE FOR 14 DAYS. SINCE MOSAIC'S MEDICAL STAFF CONSULTED WITH ME PRIOR TO MY DISCHARGE BACK TO THIS FACILITY, THAT I WOULD NEED TO CONTINUE OXYGEN THERAPY, I JUST KNEW THAT I WOULD BE ASSIGNED TO THE INFIRMARY. H.U.#10 IS NOT EQUIPPED (THE CELLS) TO HOUSE ANYONE THAT NEEDS AN OXYGEN TANK OR MACHINE BECAUSE THE CELLS DON'T HAVE THE SPECIAL ELECTRICAL OUTLET THAT IS ON A SEPARATE POWER SOURCE IN CASE OF A POWER OUTAGE. NOR DO THE CELLS HAVE AN MEDICAL EMERGENCY CALL BUTTON IN THEM THAT WILL ASSURE YOU THAT SOMEONE WILL COME TO CHECK ON YOU. I CONSTANTLY ASKED FOR THE NURSE, TO NO AVAIL, I TOLD THE COI THOMAS THAT I WAS SUPPOSE TO BE ON OXYGEN. NO ONE BROUGHT ME OXYGEN. THEN FINALLY 2 days LATER A NURSE CAME TO THE WING. WHEN ^{she} CHECKED MY VITALS AND PUT THE PULSE OXIMETER ON MY FINGER SHE SAID "WE HAVE TO GET HIM OUT OF HERE" SHE CALLED IN A CODE-16 (A MEDICAL EMERGENCY) My oxygen level was 69%.

THE DEFENDANT: CORIZON HEALTH SERVICE
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II. BASIS FOR JURISDICTION

D. THE DEFENDANT: CORIZON HEALTH SERVICE: CONTINUES

IN ONLY 2 DAYS I'M RUSHED OUT THE FACILITY BY AMBULANCE FOR THE (2ND TIME) RIGHT BACK TO MOSAIC LIFE CARE TO THE ER. I WAS DIAGNOSED WITH ACUTE RESPIRATORY FAILURE AND ADMITTED. I WAS IMMEDIATELY PUT UNDER OXYGEN IN THE AMBULANCE AND IN THE ER. I WAS TRANSFERRED TO THE 5TH FLOOR WHERE I WAS BEFORE JUST 2 DAYS AGO AND WHEN THE NURSES SAW ME ONE OF THEM ASKED "WHAT HAPPENED TO YOU?" BEFORE I COULD RESPOND, ANOTHER NURSE SAID "THEY DIDN'T GIVE YOU NO OXYGEN, DID THEY?" I SAID, "NO THEY DIDN'T." THE NURSES JUST SHOOK THEIR HEADS FROM SIDE TO SIDE, IN TOTAL DISBELIEF. I WAS ASSIGNED TO ROOM #5113 WHERE MY COVID-19 SYMPTOMS HAVE GOTTEN WORSE SINCE MY BODY AND BRAIN HAD BEEN DEPRIVED OF OXYGEN FOR 2 DAYS. MY SYMPTOMS WERE GETTING WORSE WITH DIFFICULTY BREATHING AND ON OCT. 27, 2020 MEDICAL STAFF FOUND A PE (BLOOD CLOT) IN MY LUNG. MOSAIC COVID TEAM WORKED VERY AGGRESSIVE ON ^{ME} AND ON DAY 14 PRIOR TO DISCHARGING ME BACK TO THIS FACILITY MEDICAL RECORDS ENC: 164294829 ON PAGE (22/44) MOSAIC MEDICAL STAFF INFORMED THIS FACILITY OF THE FOLLOWING INFORMATION.

"PT. IS A 63 YO GENTLEMAN FROM PRISON. HE WAS ADMITTED FOR ACUTE RESP FAILURE THAT WAS FELT MULTIFACTORIAL." "HE HAD COVID-19 AND A PE." "HE WAS TREATED AGGRESSIVELY AND DID SLOWLY IMPROVE." "HE WAS PLACED ON ORAL ANTICOAG AND WAS GRADUALLY WEANED TO A LOWER LEVEL OF OXYGEN." "UNFORTUNATELY HE WAS NOT ABLE TO BE WEANED COMPLETELY FROM THE OXYGEN AT THE TIME OF DISCHARGE."

THE DEFENDANT: CORIZON HEALTH SERVICE

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II. BASIS FOR JURISDICTION

D. THE DEFENDANT: CORIZON HEALTH SERVICE: CONTINUES

" HIS FACILITY STATED THEY COULD PROVIDE THE LEVEL OF OXYGEN HE WOULD NEED AND HE WAS RELEASED BACK TO HIS FACILITY IN STABLE CONDITION TO CONT' TO WORK TO WEAN FROM THE NC₀₂."

I, THE PLAINTIFF, RODNEY B. HOLMES WAS RELEASED BACK TO THIS FACILITY ON NOV 5, 2020. WHEN I GOT BACK TO W.M.C.C. I WAS PUT RIGHT BACK IN THE SAME DIRE SITUATION I ^{was} IN BEFORE. I WAS PUT IN HOUSING UNIT #10 WITH NO OXYGEN, NO MEDICATION NO NURSES TO CHECK ON ME. I BEGGED FOR OXYGEN AND FOR MEDICATION. I DID NOT RECEIVE ANY OXYGEN, ANY MEDICATION OR NOTHING. LOOK AT THE CAMERAS THEY WILL VERIFY THAT I AM TELLING THE TRUTH. I PAID CORIZON HEALTH SERVICE \$68.00 FOR ACCURATE AND COMPLETE MEDICAL RECORDS INSTEAD I RECEIVED A COMPLETELY 100% FALSIFICATION OF THE RECORDS FROM WMCC RE: THE EVENTS THAT TOOK PLACE FROM NOV. 5, 2020 TO NOV. 11, 2020 IN HOUSING UNIT #10. FINALLY ON NOV. 11, 2020 AT 12:30 I HAD A STROKE WHILE I SAT ON THE TOILET AND WAS PARALYZED ON ^{my} LEFT SIDE OF MY BODY. I COULD NOT MOVE OR TALK OR SCREAM FOR HELP. I HAD NO MEDICAL EMERGENCY CALL BUTTON. I JUST SAT WAITING ON SOMEONE TO COME BY WHILE BRAIN TISSUE STEADY DYING. FINALLY THE LIGHT IN THE CELL FLICKED ON FROM THE LIGHT SWITCH ON THE OUTSIDE OF THE CELL DOOR, A COI WAS JUST MAKING A WALK THROUGH.

THE DEFENDANT: CORIZON HEALTH SERVICE
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II BASIS FOR JURISDICTION

D. THE DEFENDANT: CORIZON HEALTH SERVICE: CONTINUES

THE COI SAW THAT I WAS WAVING MY RIGHT HAND AROUND VIGOROUSLY TO ~~MA~~^{MAKE} SURE I GOT HER ATTENTION. THEN THE COI SAID "ARE YOU SICK?" I WAS ABLE TO VIGOROUSLY SHAKE MY HEAD UP AND DOWN WITH MY MOUTH WIDE OPEN TRYING TO JUST MAKE A SOUND BUT NOTHING WOULD COME OUT. THE OFFICER SAID "OKAY" AND CALLED FOR BACK-UP. AGAIN FOR THE (3RD TIME) IN 25 DAYS I ~~IM~~ RUSHED OUT THE INSTITUTION FOR A CODE-16. FIRST, TO CAMERON REGIONAL MEDICAL CENTER, IT WAS 3:00AM. WHEN I GOT THERE THEN TRANSFERRED TO SAINT LUKE'S HEALTH SYSTEM WHERE I STAYED 6 DAYS. I WAS DISCHARGED ON NOV. 17, 2020 TO THE INFIRMARY HERE AT WMCC. FROM THE TIME OF NOV. 17, TO DEC. 18, 2020 THE MEDICAL ORDER FROM SAINT LUKE'S HEALTH SYSTEM WAS FOLLOWED BUT THE DAMAGE WAS ALREADY DONE. CORIZON HEALTH SERVICE KNEW OR SHOULD HAVE KNOWN ABOUT THIS VIOLATION OF A SERIOUS MEDICAL NEED AND BETWEEN AUG 31, 2021 WHEN I PAID YOU \$68.00 FOR MY PERSONAL MEDICAL RECORD UNTIL NOV. 2021 A COPY OF ENC: 164101057 RECORDS WHERE ^{THE} TRUTH HAD BEEN CHANGED AND COVERED-UP TO HIDE THE TRUTH, ONE PERSON COULD ^{NOT} HAVE DONE THIS WITHOUT CORIZON KNOWING ABOUT IT.

NOTE: CAMERON REGIONAL MEDICAL CENTER AND SAINT LUKE'S HEALTH SYSTEM BOTH ON (NOV. 11, 2020) DIAGNOSED ME WITH ACUTE RESPIRATORY FAILURE, STROKE AND NEGATIVE FOR COVID-19.

THE DEFENDANT: PHYLLIS L. PHELPS
(1 of 4 pages)

II. BASIS FOR JURISDICTION

D. THE DEFENDANT PHYLLIS L. PHELPS WORKED AS A NURSE PRACTITIONER AT W.M.C.C. AT THE TIME THE VIOLATION OCCURRED AGAINST THE PLAINTIFF, RODNEY B. HOLMES. THE DEFENDANT WAS AN EMPLOYEE FOR CORIZON HEALTH SERVICE. ALSO THE DEFENDANT DOES NOT WORK HERE AT WMCC ANY MORE.

AFTER I RETURNED BACK TO MOSAIC ON OCT. 22, 2020 MY BOUT WITH COVID-19 DID GET WORSE BECAUSE I DID NOT HAVE OXYGEN FOR 2 DAYS PRIOR TO MY RETURN. MY SYMPTOMS WERE DIFFICULTY BREATHING TO THE POINT THAT I HAD TO WEAR THE HIGH FLOW MASK AS PART OF THE OXYGEN THERAPY AT A OXYGEN FLOW: 13L/MIN. I ALSO DEVELOPED A PE. (BLOOD CLOT) IN MY LUNG A FEW DAYS LATER ON OCT. 27, 2020. WHEN I WAS AT MOSAIC THE (1ST TIME) FOR 3 DAYS FROM: OCT. 17 (TO) OCT 20, 2020 I USED THE PLASTIC TUBING TO DELIVER OXYGEN TO MY BODY FOR THE ENTIRE 3 DAYS I WAS THERE AT (MOSAIC)

I WAS AT MOSAIC FOR 14 DAYS BEING TREATED AGGRESSIVELY AS MEDICAL RECORDS WILL SHOW BUT, UNFORTUNATELY I WAS UNABLE TO BE COMPLETELY WEENED OFF THE OXYGEN PRIOR TO BEING DISCHARGED ON NOV. 5, 2020. PRIOR TO BEING DISCHARGED FROM MOSAIC MEDICAL RECORD WILL VERIFY THAT THE INSTRUCTIONS IN THE MEDICAL ORDER WERE GIVEN TO THIS FACILITY AND THEY READ AS FOLLOWS:

"PATIENT IS A 63 ^{YEAR OLD} ~~YEAR OLD~~ GENTLEMAN FROM PRISON." "HE WAS ADMITTED FOR ACUTE RESP FAILURE THAT WAS FELT MULTIFACTORIAL." "HE HAD COVID-19 AND A P.E." "HE WAS TREATED AGGRESSIVELY AND DID SLOWLY IMPROVE." "HE WAS PLACED ON ORAL ANTICOAG AND WAS GRADUALLY WEANED TO A LOWER LEVEL OF OXYGEN."

II. BASIS FOR JURISDICTION

D. THE DEFENDANT PHYLLIS L. PHELPS: CONTINUES:

"UNFORTUNATELY, HE WAS NOT ABLE TO BE COMPLETELY WEANED FROM THE OXYGEN AT THE TIME OF DISCHARGE." "HIS FACILITY STATED THEY COULD PROVIDE THE LEVEL OF OXYGEN HE WOULD NEED AND HE WAS RELEASED BACK TO HIS FACILITY IN STABLE CONDITION TO CONT TO WORK TO WEAN-FROM THE NC O₂."

MEDICAL STAFF AT MOSAIC LIFE CARE CONSULT^{ED} WITH ME EVERYDAY I WAS THERE. BEFORE I WAS DISCHARGED STAFF TOLD ME THAT I TESTED NEGATIVE TWICE FOR COVID-19. I JUST NEED TO BE WEANED COMPLETELY OFF OF THE OXYGEN AND CONTINUE TO TAKE MY MEDICATION. WHEN I GOT BACK TO THIS FACILITY (W.M.C.C.) ON NOV. 5, 2020, I WAS PUT IN HOUSING UNIT 10-A-wing WHERE EVERYBODY IS ISOLATED AND QUARANTEED. THIS IS NOT A MEDICAL^{UNIT} OR THE PLACE FOR SOMEONE THAT NEED OXYGEN THERAPY NEEDS TO BE.

I NEVER TALK TO OR SAW THE DEFENDANT PHYLLIS L. PHELPS UNTIL AFTER I SUFFERED A STROKE ON NOV. 11, 2020 AT 12:30 A.M. I DID NOT RECEIVE ANY OXYGEN OR BLOOD THINNERS AND OTHER MEDICATION THAT WERE IN THE ORDER.

AS I STATED IN MY 'STATEMENT OF CLAIMS' PART OF THIS COMPLAINT THIS TIME PERIOD IN QUESTION OCT. 20, 2020 TO OCT. 22, 2020 AND NOV. 5, 2020 TO NOV. 11, 2020 WAS DURING THE HEIGHT OF THE PANDEMIC OF THE COVID-19 VIRUS. PRISONERS HAD DIED HERE AT W.M.C.C AND I WAS ALMOST ONE OF THEM.

II. BASIS FOR JURISDICTION

D. THE DEFENDANT PHYLLIS L. PHELPS: CONTINUES:

Housing Unit #10 IS A REGULAR H.U THAT'S FOR GENERAL POPULATION. IT HAS 4 WINGS (A,B,C,D) EACH WING HOLDS ABOUT 50. ^{FROM} TWO WINGS WERE CLEARED OUT (A+B wing) AND USED TO HOUSE ALL THE PRISONERS THAT TEST POSITIVE FOR COVID-19 OR SHOW SIGNS OF BEING ASYMPTOMATIC. THE CELLS ARE NOT EQUIPPED WITH THE SPECIAL ELECTRICAL OUTLET THAT'S CONNECTED TO A SEPARATE POWER SOURCE IN CASE OF A POWER OUTAGE WHICH ROUTINELY ^{HAPPENS} HERE AT WMCC. THERE IS NO MEDICAL EMERGENCY CALL BUTTON THAT WILL ALERT STAFF BY FLASHING LIGHTS AND MAKING NOISE TO ASSURE YOU THAT SOMEONE WILL COME TO YOUR AID.

THERE WERE NO NURS COMING BY 3 TIMES A WEEK, NO MEDICATION AND NO OXYGEN TANK IN THAT CELL. I COMPLAINED AND ASKED FOR OXYGEN. OFFICER THOMAS WAS THERE ON BOTH OCCASIONS OCT. 20, 2020 TO OCT. 22, 2020 AND NOV. 5, 2020 TO NOV. 11, 2020. HE WORKED IN H.U. 10. HE HAD TO BRING MY FOOD TO ME, HE ALSO BROUGHT ICE TO ME. AT ONE POINT I COULD NOT GET UP AND GET MY FOOD BECAUSE I HAD NO ENERGY. I FELT EXHAUSTED AND DIFFICULT TO BREATHE A FEW DAYS BEFORE I HAD THE STROKE. ASK COI MCKENZIE WHO CAME TO THE CELL TO HELP ME OFF THE TOILET WHERE I HAD THE STROKE AND WAS PARALYZED ON THE LEFT SIDE OF MY BODY. HE ALSO TOOK ME TO THE HOSPITAL BY AMBULANCE. ASK HIM IF THERE WAS AN OXYGEN TANK IN THAT CELL.

LOOK AT THE CAMERAS, THEY WILL VERIFY THAT I AM TELLING THE TRUTH.

THE DEFENDANT PHYLLIS L. PHELPS
(4 of 4)

II. BASIS FOR JURISDICTION

D. THE DEFENDANT PHYLLIS L. PHELPS COMMITTED THE VIOLATION AGAINST THE PLAINTIFF: RODNEY B. HOLMES WHILE ACTING UNDER THE COLOR OF STATE LAW. THE VIOLATION OCCURRED ON NOV. 5, 2020 AND CONTINUED UNTIL NOV. 11, 2020 WHEN I, THE PLAINTIFF, SUFFERED A STROKE. I EXPLAINED IN GREATER DETAIL THE CIRCUMSTANCES THAT LEAD UP TO THE STROKE IN 'STATEMENT OF CLAIMS' PORTION OF THIS COMPLAINT. ALSO, THE MEDICAL RECORDS THAT PERTAINS TO THE DATES IN QUESTION (NOV. 5, 2020 TO NOV. 11, 2020) HAS BEEN FALSIFIED ^{HAPPENED} TO COVER-UP THE TRUTH ABOUT WHAT TO ME ON THE DATES IN QUESTION. AFTER THE STROKE AND I RETURNED HERE TO (W.M.C.C.) ON NOV. 17, 2020 AND FINALLY ASSIGNED TO THE INFIRMARY. THIS WAS THE FIRST TIME THAT I ENCOUNTERED THE DEFENDANT PHYLLIS L. PHELPS. AT THAT TIME PHYLLIS L. PHELPS PROVIDED THE TREATMENT THAT WAS ORDERED BY SAINT LUKE'S HEALTH SYSTEM UNTIL I WAS DISCHARGED FROM THE INFIRMARY ON DEC. 18, 2020. UNFORTUNATELY, THE DAMAGE HAD ALREADY BEEN DONE. THE DEFENDANT HAS RESPOND TO THIS COMPLAINT BY TRYING TO BLEND IN THE FALSIFICATION ON MEDICAL RECORDS DATES NOV. 5, 2020 TO NOV. 11, 2020 WITH THE TRUTH OF THE MEDICAL RECORDS DATES STARTING ON NOV. 17, 2020 TO DEC. 18, 2020. I, THE PLAINTIFF, KNOWS EXACTLY WHAT HAPPENED TO ME AND WHEN IT HAPPENED NOV 5, 2020 TO NOV. 11, 2020.

LOOK AT THE CAMERAS, THEY WILL VERIFY THAT I, RODNEY B. HOLMES IS TELLING THE TRUTH.

II. BASIS FOR JURISDICTION

(D) THE DEFENDANT EMILY NIXDORF IS THE MEDICAL RECORDS CLERK HERE AT W.M.C.C. I THE PLAINTIFF REQUESTED TO REVIEW MY MEDICAL RECORDS FROM OCT. 17, 2020 TO NOV. 17, 2020. EMILY CALLED ME TO THE MEDICAL RECORDS OFFICE TO REVIEW MY RECORDS ON AUG. 13, 2021. I REVIEWED THE MEDICAL RECORDS FROM THE 3 HOSPITALS I WAS RUSHED TO BY AMBULANCE DURING THAT 30 DAY TIME SPAN. AFTER I REVIEW THE MEDICAL RECORDS FROM MOSAIC LIFE CARE WHERE I WAS ADMITTED FROM OCT. 17, 2020 TO OCT. 20, 2020 AND AGAIN 2 DAYS LATER ON OCT. 22, 2020 TO NOV. 5, 2020. ALSO, I WAS RUSH TO CAMERON REGIONAL MEDICAL CENTER ON NOV. 11, 2020. STAYED FOR SEVERAL HOURS AND THEN I WAS TRANSFERRED AND ADMITTED TO SAINT LUKE'S HEALTH SYSTEM UNTIL NOV. 17, 2020. I REQUESTED TO PURCHASE THESE MEDICAL RECORDS AS WELL AS THE MEDICAL RECORD FROM THIS INSTITUTION (W.M.C.C.) DURING THE SAME ^{TIME} SPAN.

EMILY TOLD ME THAT THE MEDICAL RECORDS WOULD COST \$15.00 FOR THE INITIAL HANDLING FEE AND \$0.35 PER PAGE COPIED. I AGREED AND LATER I RECEIVE A MEMO DATED AUG. 26, 2021 FROM MEDICAL RECORDS CLERK, CORIZON HEALTH, STATING THAT IT WAS 150 PAGES AND THE COST WOULD BE 67.50.

ON AUG. 31, 2021 I FILLED OUT A GREEN CHECK FOR \$68.00 AND WITHIN A WEEK THE CHECK WAS CLEARED FOR THE PURCHASE OF THE MEDICAL RECORDS.

THE DEFENDANT: EMILY NIXDORF CONT

(2 of 3 pages)

II. BASIS FOR JURISDICTION

(D.) THE DEFENDANT, EMILY NIXDORF, AFTER TWO (2) PRIOR REQUEST FOR PAID FOR MEDICAL RECORDS FROM THE PLAINTIFF (ME) EMILY CALLED ME TO MEDICAL ON SEPT. 24, 2021 AND GAVE ME SOME MEDICAL RECORDS. ONCE I GOT BACK TO THE CELL AND LOOKED OVER ALL THE RECORDS, I NOTICE THAT THE MEDICAL RECORDS FROM MOSAIC LIFE CARE FOR THE FIRST 3 DAYS I WAS ADMITTED FROM OCT. 17, 2020 TO OCT. 20, 2020 WERE NOT ENCLOSED IN THE PACKET. NOR WERE THERE ANY RECORDS FROM THIS INSTITUTION (WMCC.) IN THE PACKET.

ON OCT. 28, 2021 EMILY CALLED ME TO HER OFFICE WE LOOK AT RECORDS ON THE COMPUTER FOR THIS INSTITUTION (WMCC) THE INFORMATION THAT WAS ON THE COMPUTER WHEN WE FIRST LOOKED AT IT ON Aug 13, 2021 WAS GONE. EMILY SAID THAT SHE WAS STILL WAITING ON THE MEDICAL RECORDS FROM MOSAIC LIFE CARE FOR OCT. 17, 2020 TO OCT 20, 2020. FINALLY, EMILY NIXDORF CALLED ME TO THE RECORDS OFFICE A FEW WEEKS LATER IN NOV. 2021. EMILY GAVE ME THE MEDICAL RECORDS FROM MOSAIC LIFE CARE FOR THE FIRST 3 DAYS THAT I WAS THERE FROM OCT. 17, 2020 TO OCT. 20, 2020. WHEN I ASKED ABOUT THE MEDICAL RECORDS FROM THIS INSTITUTION (WMCC.) EMILY GOT ON THE COMPUTER THEN SHE WENT TO THE COPY MACHINE AND AS COPIES WERE COMING OFF THE COPY MACHINE, EMILY WAS KIND OF MUMBLING THE WORDS "THOSE NOT-IT." SHE ENDED UP WITH 2 SMALL STACKS. THE STACK THAT SHE MUMBLED TO AND THE STACK SHE PLAN TO GIVE ME. WHEN SHE CAME BACK TO HER DESK SHE LITERALLY TOOK 1 STACK OF COPIES AND PLACED THEM ON THE FLOOR UNDER THE DESK, THEN GAVE ME THE OTHER STACK.

THE DEFENDANT: EMILY NIXDORF CONT (3 of 3 pages)

II. BASIS FOR JURISDICTION

① THE DEFENDANT EMILY NIXDORF AND T. RODNEY B. HOLMES AM THE PLAINTIFF. WHEN I REVIEWED MY MEDICAL RECORDS ON AUG. 13, 2021 I SIGNED A WAIVER TO RELEASE A COPY OF MY RECORDS TO CORIZON HEALTH SO THAT I COULD PURCHASE THEM. WHEN I LOOKED AT THE PURCHASED COPY OF MY MEDICAL RECORDS FROM MOAIC LIFE CARE THE FAXED DATES HAD CHANGED FROM THE FAXED DATES WHEN I FIRST REVIEWED MY RECORDS ON AUG. 13, 2021. THE NEW FAX DATES WERE NOW OCT. 27, 2021 AND AUG. 30, 2021. ALSO, THERE WERE PARTS OF THE RECORDS THAT WERE NOT ACCURATE. THERE WERE PARTS OF THE RECORDS THAT WERE (MISSING LIKE "THE DENIAL LETTER" MENTIONED ON A FAX COVER SHEET FROM: NOAHPOINTE ROI HANDWRITTEN ON AUG. 27, 2021 TO: CORIZON ATTN: EMILY RE: RODNEY HOLMES CASE#/ID# 528263 COMMENTS: * PLEASE SEE ENCLOSED DENIAL LETTER * (THANK YOU)

NOAHPOINTE ROI WORKED AT MOSAIC LIFE CARE. ALSO MISSING FROM THE RECORDS THE FACT THAT I WAS ON OXYGEN FOR THE 3 DAYS I WAS AT MOSAIC OCT. 17-2020 TO OCT. 20, 2020 AND NEEDED IT WHEN I RETURNED HERE AT W.M.CC.

I TALKED TO EMILY NIXDORF ABOUT THE DISCREPANCIES I WAS HAVING WITH MY MOSAIC MEDICAL RECORDS AND SHE (EMILY) TOLD ME THAT IF I HAD ANY MORE ~~QUESTIONS~~ ^{COMMITTED} QUESTIONS ABOUT MY RECORDS TO HAVE MY ATTORNEY LOOK INTO IT. THE DEFENDANT ~~AND~~ THESE VIOLATIONS WHILE ACTING UNDER THE COLOR OF STATE LAW.

NOTE: THE FAX DATES FROM SAINT LUKES HEALTH SYSTEM MEDICAL RECORDS WHEN I WAS THERE: (NOV. 19, 2020) CAMERON REGIONAL MEDICAL CENTER (DEC. 21, 2020), I WAS PUSHED TO BOTH HOSPITALS ON (NOV. 11, 2020)

THE DEFENDANT: JENNIFER CANNON

(1 of 2 pages)

II. BASIS FOR JURISDICTION

D. THE DEFENDANT NURSE JENNIFER CANNON AT THE TIME IN QUESTION OCT. 20, 2020 WAS THE (D.O.N) DIRECTOR OF NURSES. I WAS DISCHARGED FROM MOSAIC LIFE CARE AFTER BEING TREATED FOR RESPIRATORY FAILURE WITH HYPOXIA, POSITIVE COVID-19 TEST RESULTS ON OCT. 17, 2020. I WAS ON OXYGEN THERAPY THE WHOLE TIME (3 DAYS THE 1ST TIME) I WAS ADMITTED TO MOSAIC LIFE CARE. WHEN I DISCHARGED BACK TO THIS INSTITUTION (W.M.C.C.) THE DEFENDANT JENNIFER CANNON CHECKED MY VITALS AND WHEN SHE CHECKED MY OXYGEN LEVEL WITH THE PULSE OXIMETER, SHE SAID "TAKE A COUPLE OF DEEP BREATHES" SO I DID THE "SHE SAID "TAKE A COUPLE MORE" I DID, SO THEN SHE SAID "SEE THERE, THAT'S ALL YOU GOT TO DO. "THEY ALWAYS TRYING TO GET YOU GUYS HOOKED ON THAT OXYGEN." THE TRANSPORTATION OFFICER THAT BROUGHT ME BACK FROM MOSAIC, WAS STANDING RIGHT THERE. HE WAS ALSO THE ONE THAT GAVE JENNIFER CANNON THE DOCTOR'S ORDER FROM MOSAIC. I WAS ALSO INFORMED BY MOSAIC'S MEDICAL STAFF THAT I WOULD BE CONTINUING OXYGEN THERAPY ONCE I RETURNED TO THIS INSTITUTION (W.M.C.C.). THAT PART OF THE ORDER MYSTERIOUSLY DISAPPEARED FROM THE RECORDS ONCE I WAS RUSHED OUT THE INSTITUTION BY AMBULANCE IN JUST 2 DAYS ON OCT. 22, 2020 FOR THE (2ND TIME) BACK TO THE ER OF MOSAIC LIFE CARE. DIAGNOSED WITH ACUTE - RESPIRATORY FAILURE AGAIN.

THE DEFENDANT: JENNIFER CANNON
(2 OF 2 PAGES)

II. BASIS FOR JURISDICTION

D. THE DEFENDANT JENNIFER CANNON DOCUMENTED MY OXYGEN LEVEL AT 92-95% UPON MY RETURN FROM MOSAIC LIFE CARE ON OCT. 20, 2020. WHAT SHE (NURSE JENNIFER CANNON) DID NOT DOCUMENT WAS THAT IN ORDER TO OBTAIN THAT PERCENTAGE (92-95%) JENNIFER INSTRUCTED ME TO "TAKE A COUPLE OF DEEP BREATHES" I DID IT TWICE AND THAT WAS THE ONLY REASON THAT PERCENTAGE WAS OBTAINED. I WAS RIGHT THERE WATCHING THE PULSE OXIMETER AND WITHOUT ME TAKING THOSE DEEP BREATHES MY OXYGEN LEVEL WAS UNDER 90%. ALSO, WHEN I WAS DISCHARGED FROM MOSAIC ABOUT 45 MINUTES EARLIER, THE TRANSPORTATION OFFICERS THAT TRANSPORTED ME FROM MOSAIC BACK TO THIS FACILITY DID NOT HAVE A PORTABLE OXYGEN MACHINE SO I DID NOT HAVE OXYGEN FOR THAT SHORT PERIOD OF TIME BUT, TWO DAYS WAS JUST TOO ^{MUCH} FOR MY BODY AND BRAIN TO FUNCTION WITHOUT OXYGEN. THE PROOF IS EVIDENT WHEN I WAS RUSHED BACK TO MOSAIC'S E.R. IN 2 DAYS WITH ACUTE RESPIRATORY FAILURE. THIS WAS A FORESEEABLE INCIDENT THAT NURSE JENNIFER CANNON DISREGARDED AND DIDN'T FOLLOW THE INSTRUCTION THAT WAS IN THE ORDER. THE DEFENDANT NURSE JENNIFER CANNON WAS "ACTING UNDER THE COLOR OF STATE LAW" WHEN THESE EVENTS OCCURRED, THIS IS THE REASON THAT PARTS OF MY MEDICAL RECORDS ARE NOT ACCURATE, INCOMPLETE, FAX DATES CHANGE AND WMCC MEDICAL RECORD HAS BEEN DELIBERATELY FALSIFIED TO COVER-UP THE TRUTH.

MEDICAL RECORDS FROM MOSAIC CONFIRM THE FACT THAT WHEN I LEFT WMCC BY AMBULANCE ON OCT. 22, 2020 MY OXYGEN LEVEL WAS (69%).